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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

JUNG SOON LEE, (Deceased)
by SUNG YOUNG LEE, Personal
Representative,

Plaintiff,

vs.

DONG GUK CORPORATION,

Defendants.

CIVIL ACTION NO. CV 05-0031

**PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO
DEFENDANT DONG GUK
CORPORATION**

TO: DONG GUK CORPORATION

Plaintiff requests Defendant to produce for examination, inspection and copying all documents or items listed herein which are in his possession, custody and control, at the offices of Torres Brothers, LLC., Bank of Guam Building 3rd Floor, Garapan, Saipan, MP 96950 or some other convenient location mutually agreed upon by the parties, within thirty (30) days of receipt of this request. Pursuant to Rule 34 of the Commonwealth Rules of Civil Procedure, Defendant is required to file a written response hereto within thirty (30) days after service of this request.

The following Definitions and Instructions are to be considered applicable to each Request and are hereby incorporated into each of the Requests to which it pertains:

DEFINITIONS

1. “YOU” or “YOUR” means and includes the person responding to this request for production and all other persons or entities acting or purporting to act on her behalf, including, without limitation, its present and former attorney(s), investigator(s), insurance carrier(s) and/or agent(s) accountant(s) and their agents, employees, and consultants; her present and former offices, directors and/or partners; its present and former affiliates, subsidiaries, controlled companies, parent and/or other similar entities.
2. “PERSON” includes, without limitation, any natural person, firm, partnership, association, joint ventures, sole proprietorship, organization, business trust, corporation, or any other group combination acting as a unit or other form of legal, business, non-profit, or governmental entity.
3. “SUBJECT LAWSUIT” means this lawsuit known and numbered as appears on the cover of this document. It also means ¶¶ 5-17 of the Complaint.
4. “DOCUMENTS,” “RECORDS” and “WRITING” mean and include the original and any copy, regardless of origin or location, of any printed, typed, written, graphic or recorded materials or tangible things of every kind, however produced or reproduced, in its possession, custody or control, and includes but is not limited to, any letters, correspondence, memoranda, telegrams, telexes, other communications, agreements, contracts, offers, proposals, prospectuses, ballot tariffs, promissory notes, deeds, leases, agreements of sales, mortgages, financial statement, balance sheets, profit and lose statements, tax returns, loan applications, work papers, ledgers, journals books of accounts, cancel checks, deposit receipts, statement, bills, air bills, consignment note, purchase orders, invoice, summaries, outlines, estimates, budgets, projections, cost analyses, damage calculations, bulletins, books, periodicals, newsletters, articles, brochures, advertisements, reports, logs, agenda, minutes, studies, charts, graphs, maps, drawings, schedules, plans, blueprints, sketches, schematics, models, surveys, printouts, cards, diaries, calendars, desk calendars, appointment books, photographs, slides, films, notes, drafts, worksheets, transcripts, recordings (mechanical, electrical, typed or written)

1 or any instrument or device which contains any information or from which any
2 information can be derived or retrieved.

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4 **INSTRUCTIONS**

5 The following instructions are to be considered applicable to all demands for production
6 of DOCUMENTS and things contained herein:

- 7 1. In producing these DOCUMENTS, YOU are required to furnish all DOCUMENTS
8 known or available to YOU regardless of whether these DOCUMENTS are possessed
9 directly by YOU or YOUR agents, employees, representatives, investigators, or by
10 YOUR attorneys or their agents, employees, representatives or investigators.
- 11 2. If any of these DOCUMENTS cannot be produced in full, produce to the extent possible,
12 specifying your reasons for your inability to produce the remainder and stating whatever
13 information, knowledge, or belief you do have concerning the unproduced portion.
- 14 3. If any DOCUMENTS or things requested were at one time in existence, but are no longer
15 in existence, please so state, specifying for each DOCUMENT or thing:
- 16 a. The type of information contained thereon,
 - 17 b. The type of DOCUMENT or thing,
 - 18 c. The date upon which it ceased to exist,
 - 19 d. The circumstances under which it ceased to exist,
 - 20 e. The identity of all PERSONS having knowledge of the circumstances
21 under which it ceased to exist, and
 - 22 f. The identity of all PERSONS having knowledge of the contents thereof.
- 23 4. If YOU refuse to produce any DOCUMENT on grounds of privilege, work product, or
24 other reasons, please identify each DOCUMENT not produced by author, recipient, date,
25 and general subject matter.
- 26 5. The requests are continuing. If, after producing DOCUMENTS, YOU obtain or become
27 aware of any further DOCUMENTS responsive to this request, YOU are required to
28 produce to Plaintiff such additional DOCUMENTS.

REQUESTS

1. Please provide copies of all DOCUMENTS provided to YOU which is RELEVANT to the SUBJECT LAWSUIT.
2. Please provide copies of all STATEMENTS made by any PERSON to YOU, YOUR agents or attorneys related to the INCIDENT.
3. Please provide the insurance policy relating to the SUBJECT LAWSUIT.
4. Please provide copies of statements made by YOU to anyone relating to the SUBJECT LAWSUIT including YOUR attorneys except those that fall under attorney-client privilege.
5. Please provide copies of any photographs or video tapes prepared at YOUR request or on YOUR behalf which are in any manner related to the SUBJECT LAWSUIT.
6. Please provide copies of any photographs or video tapes prepared which are in any manner related to the SUBJECT LAWSUIT.
7. Please provide copies of any reports prepared at YOUR request or at the request of anyone acting on YOUR behalf related to the SUBJECT LAWSUIT.
8. Please provide copies of all DOCUMENTS which YOU rely on in answering Plaintiff's First Set of Interrogatories.
9. Please provide YOUR business license.
10. Please provide YOUR Articles of Incorporation.
11. Please provide YOUR By-laws.
12. Please provide YOUR Annual Report for 2003, 2004 and 2005.
13. Please provide YOUR business gross revenue taxation for 2003, 2004 and 2005.
14. Please provide YOUR business balance statement or balance report for 2003, 2004 and 2005.
15. Please provide copies of all DOCUMENTS that indicate authorization of selling and serving alcoholic beverages.
16. Please provide copies of all DOCUMENTS, company manuals or company procedures

1 which show YOUR policy or procedure regarding serving alcoholic beverages to
2 customers.

3 17. Please provide DOCUMENTS which indicate YOUR business establishment hours to do
4 and conduct business.

5 18. Please provide DOCUMENTS which indicate YOUR employees or agents who worked
6 during July and August, 2004.

7 19. Please provide DOCUMENTS which indicate YOUR employees or agents' work
8 schedule during July and August, 2004.

9 20. Please provide DOCUMENTS which show or indicate YOUR employees or agents'
10 employment records.

11 21. Please provide all of YOUR receipts for August 02, 2004.

12 22. Please provide DOCUMENTS which show any complaints made by YOUR customers,
13 employees or agents regarding YOUR business practice and/or business establishment.

14 23. Please provide DOCUMENTS which show any complaints made by anyone regarding
15 YOUR business practice and/or business establishment.

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17 Dated: ____/____/____.

18 TORRES BROTHERS, LLC.

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21 VICTORINO DLG. TORRES
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